## REMARKS/ARGUMENTS

### I. Status of Claims

Prior to this Amendment, claims 1 and 3-17 were pending with claims 1 and 17 being independent. By this Amendment, claims 1, 3, 4, 14, 16 and 17 have been amended, claims 5 and 13 have been canceled, and new claims 18-22 have been added.

### II. Rejections under 35 U.S.C. §103(a)

Claims 1, 3, 5-6, and 17

Claims 1, 3, 5-6, and 17 are rejected under 35 U.S.C. §103(a) as being unpatentable over Pirskanen et al. (U.S. Pub. No. 2004/0157640 – hereinafter Pirskanen) and in view of Khawand et al. (U.S. Pub. No. 2004/0037304 – hereinafter Khawand). Applicants respectfully traverse this rejection.

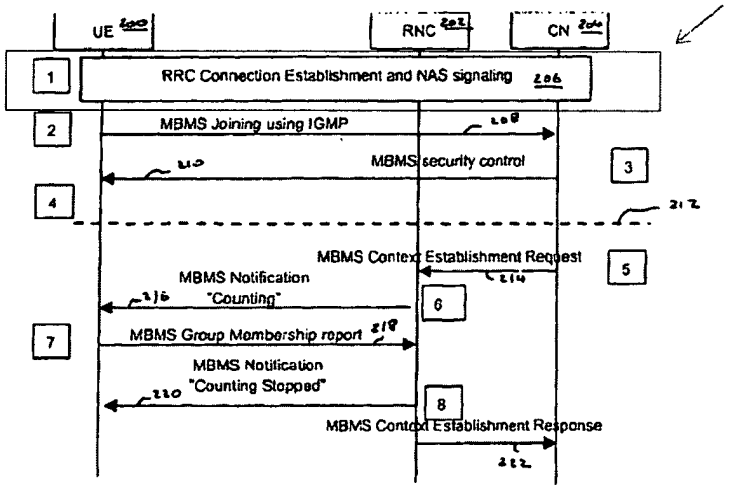
Claim 1 recites a method for initiating uplink signaling by a UE receiving a multimedia multicast/broadcast service (MBMS), the method comprising steps of:

> "receiving information including an indication indicating one of UE counting and establishment of a point-to-point channel used by the MBMS over a MBMS control channel;
>
> in case a UE is in IDLE mode, transmitting, by the UE, an uplink signaling message for a RRC (Radio Resourec Control) Connection establishment using the received indication; and
>
> receiving, by the UE, a response message in response to the uplink signaling message."

Hence, claim 1 is with respect to the context of receiving information including an indication indicating one of UE counting and establishment of a point-to-point channel used by the MBMS over a MBMS control channel *when the UE is in IDLE mode*. In addition, under the above-noted context as claimed, the claimed method includes the step of *transmitting, by the UE, an uplink signaling message for*

*a RRC (Radio Resourec Control) Connection establishment using the received indication.*

By contrast, Pirskanen is unrelated to the above-noted claim context of receiving information including an indication indicating one of UE counting and establishment of a point-to-point channel used by the MBMS over a MBMS control channel *when the UE is in IDLE mode*. This is because, as shown in Fig. 2 of Pirskanen, Pirskanen is only directed to a context in which the RRC connection *has already been* established by virtue of Pirskanen's step 206 highlighted below, a context which, by definition, refers to a state of the UE that is not in IDLE mode.




In addition, nowhere does Pirskanen disclose or suggest "transmitting, by the UE, *an uplink signaling message for a RRC (Radio Resourec Control) Connection establishment using the received indication*" (emphasis added).

Therefore, Pirskanen is unrelated to, and thus does not disclose or suggest the claimed step of "in case a UE is in IDLE mode, transmitting, by the UE, an uplink signaling message for a RRC (Radio Resourec Control) Connection establishment using the received indication."

On the other hand, Khawand does not cure the above-noted deficiencies of Pirskanen. Accordingly, claim 1 should be allowable over Pirskanen and Khawand. The rejection of claim 1 should therefore be withdrawn.

Claim 17 contains subject matter related to that of claim 1. Accordingly, for at least the same reasons stated above in connection with claim 1, the rejection of claim 17 should be withdrawn.

The rejection of claims 3 and 5-6 should be withdrawn at least by virtue of their dependency from claim 1.

New claims 18-22 should be also be allowable over Pirskanen and Khawand at least by virtue of their dependency from claims 1 and 17, respectively.

In addition, with respect to claims 3 and 18, neither Pirskanen nor Khawand discloses or suggests "transmitting, by the UE, *an uplink signaling message for a Cell Update using the received indication*" (emphasis added), as recited in claim 3 and similarly recited in claim 18. Accordingly, claims 3 and 18 should also be allowable for its own dependent feature.

Claims 4 and 7-16

Claims 4 and 9 are rejected under 35 U.S.C. §103(a) as being unpatentable over Pirskanen in view of Khawand, and further in view of Ho (U.S. Pub. No. 2003/0236085 – hereinafter Ho). Claims 7 and 8 are rejected under 35 U.S.C. §103(a) as being unpatentable over Pirskanen in view of Khawand and Ho, and further in view of Park et al. (U.S. Patent No. 6,782,274 – hereinafter Park). Claims 10 and 12 are rejected under 35 U.S.C. §103(a) as being unpatentable over Pirskanen in view of Khawand and further in view of Marjelund et al. (U.S. Patent No. 7,433,334 – hereinafter Marjelund). Claim 11 is rejected under 35 U.S.C. §103(a) as being unpatentable over Pirskanen in view of Khawand and further in view of Koulakiotis et

al. (U.S. Patent No. 7,031,694 – hereinafter Koulakiotis) and further in view of Marjelund. Claim 13 is rejected under 35 U.S.C. §103(a) as being unpatentable over Pirskanen in view of Khawand, and further in view of Koo et al. (U.S. Pub. No. 2002/0110106 - hereinafter Koo) and Wallentin et al. (U.S. Pub. No. 2003/0003895 – hereinafter Wallentin). Claims 14 and 15 are rejected under 35 U.S.C. §103(a) as being unpatentable over Pirskanen in view of Khawand and further in view of Koulakiotis, and yet further in view of Marjelund and Van Lieshout et al. (U.S. Patent No. 6,850,759 – hereinafter Van Lieshout). Claim 16 is rejected under 35 U.S.C. §103(a) as being unpatentable over Pirskanen in view of Khawand, and further in view of Terry (U.S. Pub. No. 2004/0266447 – hereinafter Terry) and further in view of Van Lieshout.

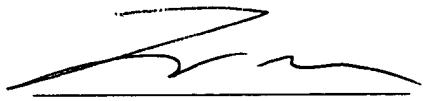
The rejection of claims 4 and 7-16 should be withdrawn at least by virtue of their dependency from claim 1 and the fact that the cited secondary references do not cure the above-noted deficiencies of Pirskanen and Khawand.

## III. Conclusion

In view of the above, it is believed that this application is in condition for allowance and notice to this effect is respectfully requested. Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the telephone number indicated below.

Should **any/additional** fees be required, the Director is hereby authorized to charge the fees to Deposit Account No. 18-2220.

Respectfully submitted,



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